

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

AMERICAN NEEDLE, INC.

Plaintiff,

Case No.

v.

ZAZZLE INC.,

Defendant.

COMPLAINT FOR PATENT INFRINGEMENT

American Needle, Inc. brings this patent-infringement action against Zazzle Inc.

Parties

1. American Needle is an Illinois corporation with its principal place of business in Buffalo Grove, Illinois.
2. Zazzle is a California corporation with its principal place of business in Redwood City, California.

Jurisdiction and Venue

3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq.*

4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court may exercise personal jurisdiction over Zazzle. This is because Zazzle conducts continuous and systematic business in Illinois and this District. For example, Zazzle sells customized coffee mugs to consumers in this District. This patent-infringement claim arises directly from Zazzle's continuous and systematic activity in

this District. In short, this Court's exercise of jurisdiction over Zazzle would be consistent with the Illinois long-arm statute, 735 ILCS § 5/2-209, and traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2).

Claim of Patent Infringement

7. American Needle is the exclusive owner of U.S. Patent 7,319,980 (the “‘980 patent”), which is attached as Exhibit 1.

8. The ‘980 patent is valid and enforceable.

9. Zazzle has and is directly infringing claims of the ‘980 patent. Zazzle practices the method for facilitating sales to potential customers claimed in the ‘980 patent. Zazzle uses a computer network server for facilitating sales of objects (*e.g.*, coffee mugs or apparel).

Prayer for Relief

WHEREFORE, American Needle prays for the following relief against Zazzle:

- (a) Judgment that Zazzle has directly infringed claims of the ‘980 patent;
- (b) For a reasonable royalty;
- (c) For pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (d) For such other and further relief as the Court may deem just and proper.

Demand for Jury Trial

American Needle demands a trial by jury on all matters and issues triable by jury.

Dated: May 5, 2015

Respectfully submitted,



By: _____

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